

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**PAMELA WHITE, as
Administratrix *Ad Prosequendum*
of the Estate of Phillip George
White,**

Plaintiff,

v.

CITY OF VINELAND et al.,

Defendants.

**Case No. 1:16-cv-08308-JDW-
AMD**

VERDICT SHEET

I. SECTION 1983 CLAIM – UNLAWFUL SEIZURE

Question 1: Do you find that the Plaintiff Pamela White has proven, by a preponderance of the evidence, that Defendant Louis Platania violated Phillip White's rights under the Fourth Amendment by stopping or arresting Mr. White?

YES

NO

X

Proceed to Section II (next page)

II. SECTION 1983 CLAIM – EXCESSIVE FORCE

Question 2: Do you find that the Plaintiff Pamela White has proven, by a preponderance of the evidence, that Defendant Louis Platania violated Phillip White's rights under the Fourth Amendment not to be subjected to excessive force?

YES _____ NO ~~_____~~

If your answer to Question 2 is YES, then answer Question 3. If your answer Questions 2 is NO, then proceed to Section III.

Question 3: Do you find that Plaintiff Pamela White has proven, by a preponderance of the evidence, that Defendant Louis Platania's violation of Mr. White's constitutional rights caused injury to Mr. White?

YES _____ NO _____

Proceed to Section III (next page)

III. SECTION 1983 CLAIM – FAILURE TO INTERVENE

Question 4: Do you find that the Plaintiff Pamela White has proven, by a preponderance of the evidence, that Richard Janasiak violated Phillip White's rights under the Fourth Amendment?

YES _____ NO X

If your answer to Question 4 is YES, then answer Question 5.

Question 5: Do you find that the Plaintiff Pamela White has proven, by a preponderance of the evidence, that Defendant Louis Platania failed to intervene in Richard Janasiak's violation of Mr. White's rights, despite having a reasonable opportunity to intervene?

YES _____ NO _____

If you have answered "YES" to Question Nos. 1, 3, or 5 proceed to Section IV (next page). If your answer to Question Nos. 1, 2 or 3, and 4 or 5 are "NO," your deliberations are complete. Please have the foreperson sign and date the verdict sheet and return to the courtroom.

IV. COMPENSATORY DAMAGES

Question 6: What amount of money do you find would fairly and adequately compensate the Estate of Philip White as compensatory damages for Officer Platania's violations? (If your answer is \$0, then your answer to this question should be \$1.00 as nominal damages.)

\$ _____

Proceed to Section V (next page)

V. PUNITIVE DAMAGES

Question 7A: Do you find by a preponderance of the evidence that Defendant Louis Platania acted maliciously or wantonly in violating Mr. White's rights?

YES _____ NO X

If your answer to Question 7A is YES, then answer Question 7B. If your answer Question 7A is NO, then proceed to the final instruction.

Question 7B: What amount of punitive damages, if any, do you award?

\$ _____

You have completed your deliberations. The foreperson shall sign the verdict sheet and notify the Court.



Foreperson

10.19.2022

Date